

Joanna M. Myers, Esq.
Nevada Bar No. 12048
Jonathan W. Fountain, Esq.
Nevada Bar No. 10351
HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes Parkway, Suite 1000
Las Vegas, Nevada 89169
Telephone: (702) 257-1483
Email: jmm@h2law.com
Email: jwf@h2law.com

Attorneys for Defendant Marlyn Ramirez

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MIKE FIELDS, an individual,

Plaintiff,

vs.

MARLYN RAMIREZ, an individual,

Defendant.

Case No. 2:21-cv-02102-CDS-EJY

**STIPULATION AND ORDER
EXTENDING THE TIME FOR
DEFENDANT TO FILE AND SERVE
HER OPPOSITION TO PLAINTIFF'S
MOTION TO COMPEL**

(First Request)

Plaintiff Mike Fields ("Plaintiff" or "Mr. Fields") and Defendant Marlyn Ramirez ("Defendant" or "Ms. Ramirez") hereby agree and stipulate as follows:

1. On December 2, 2022, Plaintiff filed Plaintiff's Motion to Compel (ECF No. 42) (the "Motion").

2. Pursuant to LR 7-2(b), Defendant's opposition to the Motion is due in 14 days, *i.e.*, on December 16, 2022.

3. Defendant's counsel has requested, and Plaintiff's counsel has agreed, to grant Defendant a 1-week extension of time, until December 23, 2022, to file and serve Defendant's opposition to the Motion.

4. Good cause exists for the requested extension because: (a) Defendant's principal counsel, Ms. Myers, is presently occupied with obligations in other matters; (b) Defendant's co-counsel, Mr. Fountain, has only very recently been introduced to this matter; and (c) Ms. Ramirez, is presently out of the country which, due to the time difference, has made communicating with her counsel more difficult.

5. This is Defendant's first request for an extension of time to file and serve her opposition to the Motion.

IT IS SO AGREED AND STIPULATED:

By: /s/ Jonathan W. Fountain
Joanna M. Myers, Esq.
Jonathan W. Fountain, Esq.
HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes Parkway, Suite 1000
Las Vegas, Nevada 89169
Telephone: (702) 257-1483
Email: jwf@h2law.com
Email: jmm@h2law.com

Attorneys for Defendant Marlyn Ramirez

By: /s/ Caleb A. Hatch
Robert J. Carlson, Esq.
Caleb A. Hatch, Esq.
LEE & HAYES, P.C.
601 W. Riverside Ave., Suite 1400
Spokane, WA 99201
Telephone: (509) 324-9256
Email: carlson@leehayes.com
Email: caleb.hatch@leehayes.com

BARRON & PRUITT, LLP
Joseph R. Meservy, Esq.
3890 West Ann Road
North Las Vegas, NV 89031
Telephone: (702) 870-3940
Email: jmeservy@lvnlaw.com

Attorneys for Plaintiff Mike Fields

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 16, 2022